

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SHERYL HARDING and MILTON CYNTJE,

Plaintiff,

- against -

THE AUTOMOBILE INSURANCE COMPANY
OF HARTFORD, CONNECTICUT,

Defendant.

Docket No.:
2007 CIV 8344

**DEMAND FOR
PRODUCTION OF
DOCUMENTS
AND THINGS**

SIRS:

PLEASE TAKE NOTICE that, pursuant to FRCP Rule 34 et seq, you are hereby required to produce and permit discovery by the Plaintiffs herein, or its attorney, of the following documents and things for inspection at 299 Broadway, Suite 1700, New York, New York on the 20th day of February, 2008:

1. Entire underwriting file prepared and maintained in connection with the subject insurance policy, including but not limited to said policy, the file folder(s), correspondence, memos, computer notes, file conference memos, written statements, diagrams, expert's reports, copies of checks in payment of any aspect of underwriting, or cost, reports of any administrative or municipal agency, any underwriting survey or report concerning the subject property, any photographs of the subject premises, applications for insurance, prior claims history, if any, declarations pages and any and all endorsements, policy forms, cancellation notices, finance

agreements, FSI forms, and photo inspection forms contained in said file.

2. The application for the subject insurance policy.

3. All agency agreements between the Defendant, the Defendant's parent company, and any agents who participated in the issuance of the subject policy in the case at bar.

4. All written underwriting guidelines in effect at the time of the issuance of the subject policy, including those writings contained in any computer notes.

5. Entire claims file prepared and maintained in connection with the subject claim, including but not limited to the file folder(s), correspondence, memos, computer notes, reserve notations, file conference memos, written statements, transcripts of oral statements, diagrams, expert's reports, copies of checks in the payment of any aspect of the claim or cost of the claim investigation, reports of any administrative or municipal agency, adjustor's reports, investigator's reports, log notes, diary entries, photographs and witness statements.

Dated: New York, New York
January 22, 2008

WILKOFKY,
FRIEDMAN,
KAREL & CUMMINS
ATTORNEYS AT LAW
299 BROADWAY
NEW YORK, NY
10007
(212) 285-0510

WILKOFKY, FRIEDMAN,
KAREL & CUMMINS


MARK L. FRIEDMAN (2313)

Attorneys for Plaintiff
299 Broadway - Suite 1700
New York, New York 10007
(212) 285-0510

To: Speyer & Perlberg, LLP
Attorneys fir Defendant
115 Broadhollow Road, Suite 250
Melville, New York 11747
(631) 673-6670

06J204.L4.wpd

WILKOFKY,
FRIEDMAN,
KAREL & CUMMINS
ATTORNEYS AT LAW
299 BROADWAY
NEW YORK, NY
10007
(212) 285-0510